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Watkins & Shepard Trucking, Inc. and  
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MELISSA ANN WRIGHT, Court Appointed Guardian of BROGAN ZANE WRIGHT,  
KAREN REIGER, and MIKE REIGER,

Case No. 2:11-cv-01575-LRH-GWF

Plaintiffs,

vs.

WATKINS AND SHEPARD TRUCKING, INC.,  
a Montana corporation; GREGORY ANDREW  
BRITT, an individual, DOES 1 through 5, and  
ROES 1 through 5,

Defendants.

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR**  
**SUBMISSION OF JOINT PRETRIAL ORDER**  
**(THIRD REQUEST)**

Plaintiffs, MELISSA ANN WRIGHT, Court Appointed Guardian of BROGAN ZANE WRIGHT, KAREN RIEGER and MIKE REIGER, (collectively referred to herein as "Plaintiffs"), and Defendants, WATKINS AND SHEPARD TRUCKING, INC., and GREGORY ANDREW BRITT, (collectively referred to herein as "Defendants"), by and through their respective counsel of record, hereby stipulate and agree to extend the deadline to submit the Joint Pretrial Order.

1       **I. Discovery completed to date:**

2       Extensive discovery has been completed, including written discovery and depositions.

3       **II. Discovery that remains to be completed:**

4       Discovery has closed, and no discovery remains to be completed. The only deadline the  
5 parties seek to extend is the deadline for filing the Joint Pretrial Order, which is currently set for  
6 May 4, 2015.

7       **III. Reason why discovery remaining was not completed:**

8       The parties have exchanged drafts of the Joint Pretrial Order and they are continuing to  
9 communicate and coordinate the final terms of the Order. There are thousands of documents and  
10 approximately 26 depositions to be evaluated for potential inclusion in the Joint Pretrial Order,  
11 which are being evaluated for potential objections, and to be addressed with proposed rebuttal  
12 evidence and testimony. Therefore, the parties request a brief extension of time to coordinate the  
13 final details of the Joint Pretrial Order to fully consider the scope of the discovery information in  
14 this case. The deadline for the Joint Pretrial Order has previously been rescheduled in accordance  
15 with other extensions of the discovery schedule, but not as a result of a request for a continuance  
16 specifically related to completion of the Joint Pretrial Order. There is no trial date and no other  
17 deadlines will be affected by this short extension.  
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IV. Proposed schedule for completing discovery

1. Last day to submit Joint Pretrial Order

May 13, 2015  
(from May 4, 2015)

IT IS SO AGREED.

DATED this 4<sup>th</sup> day of May, 2015.

DATED this 4<sup>TH</sup> day of May, 2015.

MCCULLOUGH, PEREZ & ASSOCIATES

LAXALT & NOMURA, LTD.

By 

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Attorneys for Defendants

ORDER

IT IS SO ORDERED.

DATED this 5th day of May, 2015.

  
GEORGE FOLEY, JR.  
United States Magistrate Judge